

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Carmen Herrera, Gonzalo Ruiz, Jesus Licea  
Ibanez, Concepcion Gomez, and Maria  
Ramirez individually and on behalf of other  
employees similarly situated, Plaintiffs  
v.  
Ferrara Candy Company, Defendant

Case No. 1:16-cv-10627  
Judge: Hon. Virginia M. Kendall  
Magistrate Judge: Hon. Sidney I. Schenkier

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL  
FOR PLAINTIFFS CARMEN HERRERA AND JESUS LICEA**

Now come Plaintiffs' attorneys of record, Valentin T. Narvaez and Raisa Alicea pursuant to Local Rule 83.17 of the Northern District of Illinois, and the corresponding Rules of Professional Conduct, and for this motion state:

1. On November 15, 2016, Plaintiffs filed this action, alleging violations of the Fair Labor Standards Act, the Illinois Minimum Wage Law, and the Illinois Wage Payment and Collection Act.
2. Valentin T. Narvaez and Raisa Alicea are the counsel of record for Plaintiffs Carmen Herrera and Jesus Licea in this matter.
3. Pursuant to Local Rule 83.17 of the Northern District of Illinois and pursuant to the Rules of Professional Conduct, Rule 1.16(b)(7), Plaintiffs' counsel seeks leave to withdraw from the representation of Plaintiffs Carmen Herrera and Jesus Licea.
4. Valentin T. Narvaez and Raisa Alicea seek leave to withdraw as counsel of record due to a breakdown in communication between counsel and the Plaintiffs. This breakdown of communication makes it impossible for counsel to effectively represent Plaintiffs in this matter.
5. Notice of this motion has been provided to Plaintiffs by U.S. mail at their last known addresses.

6. The notification of party contact information for Carmen Herrera and Jesus Licea are attached hereto as Exhibit A.

WHEREFORE, Plaintiffs' counsel requests this Honorable Court grant this Motion for Leave to Withdraw as Counsel for Plaintiffs Carmen Herrera and Jesus Licea.

Respectfully submitted on Friday, April 21, 2017.



**Valentin T. Narvaez**  
Plaintiffs' Counsel

Raisa Alicea  
Consumer Law Group, LLC  
6232 N. Pulaski, Suite 200  
Chicago, IL 60646  
Office: 312-878-1302